

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF PUERTO RICO

UNITED STATES OF AMERICA,

Plaintiff,

v.

COMMONWEALTH OF PUERTO RICO, et al.,

Defendants.

CIVIL NO. 12-2039 (GAG)

MOTION TO RESTRICT

TO THE HONORABLE COURT:

COME NOW Defendants Commonwealth of Puerto Rico and the Puerto Rico Police Department (“PRPB”), by and through the undersigned counsel and, pursuant to Standing Order No. 9 of February 1, 2013, respectfully state and pray as follows:

1. Given the significant public interest at stake in this case, the Motion at Docket No. 1397 (the “Motion”) and its related briefs are likely to attract attention from the Press.
2. On January 27, 2020, Defendants thus moved the Court to allow the restricted filing of the Motion in light of the sensitive nature – and *potential repercussions* in public opinion and the reform process – of the arguments contained in the Motion. (Dkt. 1396)
3. On January 28th, the Court granted Defendants’ Motion to Restrict. (Dkt. 1399).
4. Upon filing its response to the Motion on February 10th, the United States also requested leave to file its opposition under a restricted viewing level, which the Court granted immediately thereafter (Dkt. 1408).
5. On February 11th, the Court entered an Order allowing Defendants to reply to Plaintiff’s opposition no later than February 14th at noon. (Dkt. 1410)

6. In preparation to file said brief, Defendants hereby move the Court for an Order allowing the PRPB to file its *Reply in Further Support of Defendants' Motion at Docket No. 1397* under the restricted viewing level denominated "Case Participants."

WHEREFORE, the PRPB respectfully requests that the Honorable Court grant this Motion to Restrict.

CERTIFICATE OF SERVICE: It is hereby certified that on this same date, we electronically filed the foregoing with the Clerk of the Court using the CM/ECF system, which will send notification of such filing to counsel of record which are CM/ECF system participants at their corresponding e-mail addresses and which, pursuant to Local Civil Rule 5.1(b)(2), constitutes the equivalent service.

RESPECTFULLY SUBMITTED.

In San Juan, Puerto Rico, this 14th day of February, 2020.

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